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[Proposed] Lead Counsel for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

| | | |
|---|---|---------------------------|
| LEHIGH COUNTY EMPLOYEES' |) | No. 3:17-cv-00209-BRM-LHG |
| RETIREMENT SYSTEM, on Behalf of |) | |
| Itself and All Others Similarly Situated, |) | <u>CLASS ACTION</u> |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| NOVO NORDISK A/S, et al., |) | |
| |) | |
| Defendants. |) | |

[Caption continued on following page.]

DECLARATION OF CHRISTOPHER A. SEEGER IN SUPPORT OF CENTRAL
STATES, SOUTHEAST AND SOUTHWEST AREAS PENSION FUND'S
MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

| | | |
|---|---|---------------------------|
| DON ZUK, Individually and on Behalf of All Others Similarly Situated, |) | No. 3:17-cv-00358-BRM-LHG |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| NOVO NORDISK A/S, et al., |) | |
| |) | |
| Defendants. |) | |
| <hr/> | | |
| JOSEPH R. ZALESKI, JR., Individually and on Behalf of All Others Similarly Situating, |) | No. 3:17-CV-00506-BRM-LHG |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| NOVO NORDISK A/S, et al., |) | |
| |) | |
| Defendants. |) | |
| <hr/> | | |

I, Christopher A. Seeger, declare as follows:

1. I am an attorney duly licensed to practice before the courts of the State of New Jersey and this Court. I am a member of the law firm of Seeger Weiss LLP, proposed local counsel for proposed Lead Plaintiff Central States, Southeast and Southwest Areas Pension Fund's (the "Pension Fund") in the above-captioned actions. I make this declaration in support of the Pension Fund's Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Lead Plaintiff's Selection of Lead Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: Notice of pendency of class action published on *PR Newswire*, a national business-oriented wire service, on January 11, 2017;

Exhibit B: The Pension Fund's Certification;

Exhibit C: The Pension Fund's estimated losses; and

Exhibit D: Robbins Geller Rudman & Dowd LLP firm résumé.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 13th day of March, 2017, at Newark, New Jersey.

s/ Christopher A. Seeger
CHRISTOPHER A. SEEGER

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 13, 2017.

s/ CHRISTOPHER A. SEEGER
CHRISTOPHER A. SEEGER

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